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10 **UNITED STATES DISTRICT COURT**  
11 **NORTHERN DISTRICT OF CALIFORNIA - SAN FRANCISCO**

12 MARCI PATERA,

Case No. 3:14-cv-04533-JSC

13 Plaintiff,

**JOINT STIPULATION TO EXTEND  
DATE FOR INITIAL DISCLOSURES AND  
TO CONTINUE HEARING ON  
DEFENDANTS' MOTION TO DISMISS  
COMPLAINT**

14 vs.

15 CITIBANK N.A., a national banking  
association; CITIMORTGAGE, Inc., a  
corporation; et al. and Does 1-25,

Hearing:

Date: January 15, 2015

Time: 8:30 a.m.

Courtroom: F, 15th Floor

16 Defendants,

17 Plaintiff MARCI PATERA ("Plaintiff") and Defendants CITIMORTGAGE, INC. and  
18 CITIBANK, N.A. (collectively, "Defendants"), by and through their respective counsel, hereby  
19 stipulate and agree as follows:

20 1. WHEREAS, on December 24, 2014, counsels for Plaintiff and Defendants  
21 participated in a Rule 26(f) conference;

22 2. WHEREAS, pursuant to Rule 26(a)(1)(C), unless otherwise stipulated by the  
23 parties or ordered by the Court, initial disclosures are due within 14 days of the Rule 26(f)  
24 conference, or January 7, 2014;

25 3. WHEREAS, the hearing on Defendants' Motion to Dismiss the Complaint  
26 ("MTD") is currently scheduled for January 15, 2015;

4. WHEREAS, due to the volume of documents and due to the Holidays, Defendants will need more than 14 days to complete their initial disclosures; and

5. WHEREAS, Plaintiff will agree to extending the initial disclosure date, however, would like to review any initial disclosure at least 14 days in advance of the hearing on the MTD.

IT IS THEREFORE STIPULATED AND AGREED, by and among Plaintiff and Defendants, as follows:

1. The deadline for the parties to make initial disclosures under Rule 26 shall be extended, from January 7, 2014 to January 21, 2014; and

2. The hearing on the MTD, should be accordingly continued, upon agreement and consent of the Court, from January 15, 2015 to February 5, 2015;

3. The parties will, through the filing of this Joint Stipulation, petition the Court for permission to continue the hearing on the MTD.

Respectfully submitted,

## LAW OFFICES OF PETER L. KUTRUBES

Dated: January 7, 2015

By: /s/ Peter Kutrubes

PETER L. KUTRUBES  
STEPHEN P. LIN, Of Counsel  
Attorneys for Plaintiff MARCI PATERA

PITE DUNCAN, LLP

Dated: January 7, 2015

By: /s/ Cuong Nguyen

CHRISTOPHER L. PETERSON  
CUONG M. NGUYEN  
Attorneys for Defendants CITIMORTGAGE, INC.  
and CITIBANK, N.A.

Plaintiff shall file consent or declination to the Court's jurisdiction by January 15, 2015

Dated: 1/8/2015

